

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

***In re***

**STANADYNE LLC, *et al.*,<sup>1</sup>**

**Debtors.**

Chapter 11

Case No. 23-10207 (TMH)

(Jointly Administered)

**Objection Deadline: August 9, 2023 at 4:00 p.m. (ET)**

**SUMMARY OF FOURTH MONTHLY FEE APPLICATION OF YOUNG CONAWAY  
STARGATT & TAYLOR, LLP, AS CO-COUNSEL FOR THE DEBTORS, FOR  
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR  
THE PERIOD FROM JUNE 1, 2023 THROUGH JUNE 30, 2023**

Name of Applicant: Young Conaway Stargatt & Taylor, LLP

Authorized to Provide Professional Services to: Debtors

Date of Retention: March 28, 2023  
(Effective as of February 16, 2023)

Period for which compensation and  
reimbursement is sought: June 1, 2023 – June 30, 2023

Amount of Compensation sought as  
actual, reasonable and necessary: \$70,896.00

Amount of Expense Reimbursement sought  
as actual, reasonable and necessary: \$575.97

This is a(n): X monthly \_\_\_\_ interim \_\_\_\_ final  
application

This application includes 3.6 hours and \$1,576.50 in fees incurred in connection with the preparation of Fee Applications.

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: Stanadyne LLC (0378); Pure Power Technologies, Inc. (5202); Stanadyne PPT Holdings, Inc. (2594); and Stanadyne PPT Group Holdings, Inc. (1734). The Debtors' headquarters are located at 405 White Street, Jacksonville, North Carolina 28546.

Prior applications:

<b>Date Filed / Docket No.</b>	<b>Period Covered</b>	<b>Requested (\$)</b>		<b>Approved (\$)</b>		
		<b>Fees</b>	<b>Expenses</b>	<b>Fees</b>	<b>Expenses</b>	<b>Order Entered</b>
4/26/23 D.I. 241	2/16/23 - 3/31/23	\$280,464.00	\$558.40			
5/19/23 D.I. 285	4/1/12 - 4/30/23	\$181,983.00	\$286.74			
6/14/23 D.I. 365	2/16/23 – 4/30/23	\$462,447.00	\$845.14	\$462,256.50	\$845.14	7/7/23 D.I. 450
7/13/23 D.I. 447	5/1/23 - 5/31/23	\$142,705.00	\$268.15	Pending	Pending	

**COMPENSATION BY INDIVIDUAL**

<b>Name</b>	<b>Position, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate</b>	<b>Total Billed Hours</b>	<b>Total Compensation</b>
Michael R. Nestor	Partner since 2003. Joined firm as associate in 1998. Member of PA and NJ Bars since 1995. Member of DE Bar since 1996	\$1,240.00	14.70	\$18,228.00
Andrew Magaziner	Partner since 2019. Joined firm as associate in 2009. Member of NY and DE Bars since 2010.	\$870.00	14.90	\$12,963.00
Ashley E. Jacobs	Joined firm as an associate in 2011. Member of DE Bar since 2011.	\$810.00	25.00	\$20,250.00
Andrew A. Mark	Joined firm as an associate in 2021. Member of DE Bar since 2022.	\$505.00	8.0	\$4,040.00
Carol E. Cox	Joined firm as an associate in 2022. Member of DE Bar since 2022.	\$475.00	1.00	\$475.00
Brenda Walters	Paralegal	\$365.00	35.40	\$12,921.00
Debbie Laskin	Paralegal	\$365.00	3.10	\$1,131.50
Jorge Martinez	Paralegal	\$355.00	2.50	\$887.50
Total:			104.60	\$70,896.00
<b>Blended Rate for All Attorneys:</b>		<b>\$879.81</b>		
<b>Blended Rate for All Timekeepers:</b>		<b>\$677.78</b>		

**COMPENSATION BY PROJECT CATEGORY**

<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees</b>
Case Administration (B001)	15.20	\$8,317.50
Court Hearings (B002)	6.20	\$2,871.50
Cash Collateral/DIP Financing (B003)	.80	\$696.00
Schedules & Statements, U.S. Trustee Reports (B004)	3.00	\$1,584.50
Lease / Executory Contract Issues (B005)	7.80	\$4,922.00
Use, Sale or Lease of Property (B006)	21.00	\$16,806.50
Claims Analysis, Objections & Resolutions (B007)	4.10	\$2,748.50
Meetings (B008)	10.80	\$11,275.00
Stay Relief Matters (B009)	.80	\$292.00
Plan and Disclosure (B012)	6.20	\$5,273.00
Creditor Inquiries (B013)	.10	\$36.50
Employee Matters (B015)	.20	\$174.00
Retention of Professionals / Fee Issues (B017)	24.80	\$14,322.50
Fee Application Preparation (B018)	3.60	\$1,576.50
<b>TOTAL</b>	<b>104.60</b>	<b>\$70,896.00</b>

**EXPENSE SUMMARY**

<b>Expenses Category</b>	<b>Total Expenses</b>
Deposition/Transcript	\$33.95
Docket Retrieval/Search	\$59.70
Filing Fee	\$252.00
Outside Duplication Services	\$72.02
Reproduction Charges	\$158.30
<b>TOTAL DISBURSEMENTS</b>	<b>\$575.97</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

*In re*

**STANADYNE LLC, *et al.*,<sup>1</sup>**

**Debtors.**

Chapter 11

Case No. 23-10207 (TMH)

(Jointly Administered)

**Objection Deadline: August 1, 2023 at 4:00 p.m. (ET)**

**FOURTH MONTHLY FEE APPLICATION OF YOUNG CONAWAY STARGATT &  
TAYLOR, LLP, AS CO-COUNSEL FOR THE DEBTORS, FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD  
FROM JUNE 1, 2023 THROUGH JUNE 30, 2023**

Pursuant to section 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), and Rule 2016 of the Federal Rules of Bankruptcy Procedure, the law firm of Young Conaway Stargatt & Taylor, LLP (hereinafter “Young Conaway”) hereby moves the Court for reasonable compensation for professional legal services rendered as co-counsel to the above-captioned debtors and debtors-in-possession (together, the “Debtors”) in the amount of \$70,896.00 together with reimbursement for actual and necessary expenses incurred in the amount of \$575.97 for the period commencing June 1, 2023 through and including June 30, 2023 (the “Fee Period”). In support of its Application, Young Conaway respectfully represents as follows:

1. Young Conaway was employed to represent the Debtors as bankruptcy counsel in connection with these chapter 11 cases, pursuant to an order entered by the Court on March 28, 2023 [Docket No. 135] (the “Young Conaway Retention Order”). The Young Conaway

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Stanadyne LLC (0378); Pure Power Technologies, Inc. (5202); Stanadyne PPT Holdings, Inc. (2594); and Stanadyne PPT Group Holdings, Inc. (1734). The Debtors’ headquarters are located at 405 White Street, Jacksonville, North Carolina 28546.

Retention Order authorized Young Conaway to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

2. All services for which compensation is requested by Young Conaway were performed for or on behalf of the Debtors.

### **SUMMARY OF SERVICES RENDERED**

3. Attached hereto as **Exhibit A** is a detailed statement of fees incurred during the Fee Period, showing the amount of \$70,896.00 due for fees.

4. The services rendered by Young Conaway during the Fee Period are grouped into the categories set forth in **Exhibit A**. The attorneys and paralegals who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in **Exhibit A**.

### **DISBURSEMENTS**

5. Attached hereto as **Exhibit B** is a detailed statement of expenses paid during the Fee Period, showing the amount of \$575.97 for reimbursement of expenses. This disbursement sum is broken down into categories of charges, including, among other things, delivery charges, photocopying charges, teleconference charges, and transcription costs. A complete review by category of the expenses incurred for the Fee Period may be found in **Exhibit B**.

6. Pursuant to Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “~~Local Rules~~”), Young Conaway represents that: (i) its rate for copying charges is \$0.10 per page for black and white copies and \$0.80 per page for color copies; (ii) its rate for outgoing telecopier transmissions is \$0.25 per page (excluding related long distance transmission charges) with no charge for incoming telecopier transmissions; and (iii) there is no surcharge for computerized research.

**VALUATION OF SERVICES**

7. Attorneys and paraprofessionals of Young Conaway have expended a total of 104.60 hours in connection with this matter during the Fee Period.

8. The amount of time spent by each of these persons providing services to the Debtors for the Fee Period is fully set forth in the detail attached hereto as **Exhibit A**. The hourly rates set forth therein are Young Conaway's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by Young Conaway for the Period as counsel for the Debtors is \$70,896.00.

9. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given (i) the complexity of these cases, (ii) the time expended, (iii) the nature and extent of the services rendered, (iv) the value of such services, and (v) the costs of comparable services other than in a case under chapter 11 of the Bankruptcy Code. In addition, Young Conaway has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with the requirements set forth therein.

*[Remainder of page intentionally left blank]*



WHEREFORE, Young Conaway requests that allowance be made to it in the sum of \$70,896.00 as compensation for necessary professional services rendered to the Debtors for the Fee Period, and the sum of \$575.97 for reimbursement of actual necessary costs and expenses incurred during that period, and further requests such other and further relief as the Court may deem just and proper.

Dated: July 20, 2023  
Wilmington, Delaware

YOUNG CONAWAY STARGATT &  
TAYLOR, LLP

/s/ Michael R. Nestor

Michael R. Nestor (DE Bar No. 3526)  
Andrew L. Magaziner (DE Bar No. 5426)  
Ashley E. Jacobs (DE Bar No. 5635)  
1000 North King Street  
Rodney Square  
Wilmington, Delaware 19801-6108  
Telephone: (302) 571-6600  
Facsimile: (302) 571-1253  
Email: mnestor@ycst.com  
amagaziner@ycst.com  
ajacobs@ycst.com

-and-

Kathryn A. Coleman  
Christopher Gartman  
Jeffrey S. Margolin  
HUGHES HUBBARD & REED LLP  
One Battery Park Plaza  
New York, NY 10004-1482  
Telephone: (212) 837-6000  
Facsimile: (212) 422-4726  
Email: katie.coleman@hugheshubbard.com  
chris.gartman@hugheshubbard.com  
jeff.margolin@hugheshubbard.com

*Counsel for the Debtors*

**CERTIFICATION OF COMPLIANCE WITH LOCAL RULE 2016-2**

I, Michael R. Nestor, hereby certify as follows:

1. I am a partner in the applicant firm, Young Conaway Stargatt & Taylor, LLP (“Young Conaway”), and have been admitted to the bar of the Supreme Court of Delaware since 1996.

2. I have personally performed many of the legal services rendered by Young Conaway, as counsel for the Debtors, and am thoroughly familiar with all other work performed on behalf of the Debtors by the lawyers and paraprofessionals in the firm.

3. The facts set forth in the foregoing Application are true and correct to the best of my knowledge, information, and belief. Moreover, I have reviewed the requirements of Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware and submit that the Application complies with such requirements.

Dated: July 20, 2023

/s/ Michael R. Nestor  
Michael R. Nestor (No. 3526)